

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327
THIS DOCUMENT RELATES TO:	MDL No. 2327
<i>Maria G. Lara, et al. v. Ethicon, Inc., et al.</i> 2:16-cv-04191	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE
<i>Janice M. Nicely, et al. v. Ethicon, Inc., et al.</i> 2:13-cv-03940	
<i>Sandra K. Oliver v. Ethicon, Inc., et al.</i> 2:12-cv-05467	
<i>Diane J. Paluszynski, et al. v. Ethicon, Inc., et al.</i> 2:12-cv-09328	

**PLAINTIFFS' RESPONSE TO DEFENDANTS' MOTION FOR ORDER REGARDING
DISPOSITION OF NON-REVISION GYNECARE TVT PRODUCT CASES**

NOW COME the above-reference Plaintiffs, by and through the undersigned counsel, and in response to the motion of the Defendants, Ethicon, Inc. and Johnson & Johnson ("Ethicon") regarding the disposition of non-revision Gynecare TVT product cases (Doc. No. 5313), and state the following:

On March 2, 2018, Ethicon filed *Defendants' Motion for Order Regarding Disposition of Non-Revision Gynecare TVT Products Cases* (Doc. No. 5313), which proposes a disposition of cases in which plaintiff has not undergone a revision procedure. Accompanying the motion as

Exhibit A was a list of cases that Ethicon maintains are cases in which the plaintiff has a Gynecare TVT product implanted and has had no revision procedure performed.

The above-named plaintiffs are included in Ethicon's list of plaintiffs who have not undergone a revision procedure. However, each of the above-named plaintiffs have undergone a revision procedure and are not properly included in Ethicon's motion. Plaintiff's counsel has informed Ethicon that the above-named plaintiffs are not non-revision cases. Plaintiffs file this response to preserve their claims and avoid dismissal to the extent that Ethicon's motion is granted.

Dated: March 16, 2018

Respectfully submitted,

Brian A. Goldstein (NY # 2715019)
Cellino & Barnes p.c.
2500 Main Place Tower
350 Main Street
Buffalo, New York 14202
Telephone: (716) 888-8888
Facsimile: (716) 854-6291
brian.goldstein@cellinoandbarnes.com

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on March 16, 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

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